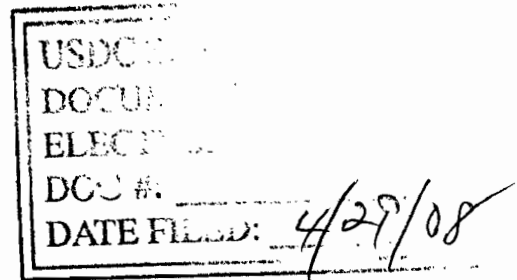


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



CHRISTINE C. ANDERSON,

Plaintiff,

-against-

THE STATE OF NEW YORK, THE OFFICE OF
COURT ADMINISTRATION OF THE UNIFIED
COURT SYSTEM, THOMAS J. CAHILL, in his
official and individual capacity, SHERRY K. COHEN,
in her official and individual capacity, and DAVID
SPOKONY, in his official and individual capacity,

Defendants.

**~~PROPOSED~~ REVISED
SCHEDULING ORDER**

07 Civ. 9599 (SAS) (DFE)

Conference Date: December 12, 2007

ECF CASE

WHEREAS, the Court issued an Order for a Conference in accordance with
Fed. R. Civ. P. 16(b) on November 16, 2007 (the "Order"); and

WHEREAS, the Order required that the parties jointly prepare and sign a proposed
scheduling order containing certain information;

NOW THEREFORE, the parties hereby submit the following information as required by
the Order:

(1) the date of the conference and the appearances for the parties;

o December 12, 2007;

o Plaintiff:

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Attorney at Law
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New York, New York 10025
Tel.: (917) 432-9226
Fax: (212) 222-2074

Defendants:

Lee Alan Adlerstein
Office of New York State Attorney General
120 Broadway, 24th Floor
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- (2) a concise statement of the issues as they then appear;
- Plaintiff, public employee, alleges that defendants subjected her to harassment and adverse employment actions, including but not limited to, termination of her employment in retaliation for her exercise of her rights under the First Amendment to the United States Constitution, in complaining to and advising her superiors of attorney misconduct and illegal acts that she had witnessed. Plaintiff also alleges that she was subjected to harassment and adverse employment actions because of her race and age, including but not limited to the termination of her employment.
 - Defendants, public agencies and officials, deny plaintiff's allegations and state that employment actions with respect to plaintiff were taken for legitimate purposes in the proper discretion of the employer.
- (3) a schedule including:
- The parties shall serve upon each other Fed. R. Civ. P. 26(a)(1) Initial Disclosures by January 22, 2008.
- (a) the names of persons to be deposed and a schedule of planned depositions:
- Depositions of fact witnesses shall be completed by August 11, 2008.
 - Depositions of expert witnesses, if any, shall be completed by October 10, 2008.
 - At this time, plaintiff intends to depose the following individuals: Hon. John Buckley; Thomas J. Cahill; Sherry K. Cohen; David Spokony; Catherine O'Hagan-Wolfe; Naomi Goldstein; Roy Vallejo; Andral Bratton; Judith Stein; and Luisa Esposito. Plaintiff reserves the right to depose additional individuals should their identity and/or relevance become apparent during the course of discovery.
 - At this time, defendants intend to depose plaintiff, reserving the right to depose other people to be named.
- (b) a schedule for the production of documents:
- First Requests for the Production of Documents shall be served by February 12, 2008. Responses thereto shall be served by March 6, 2008, and documents responsive thereto shall be produced by March 20, 2008;
 - Interrogatories, if any, shall be served by each party in accordance with the Federal Rules of Civil Procedure and Local Rule 33.3. Responses thereto shall be served within thirty days after service of the interrogatories, but shall not be required prior to March 14, 2008.

- (c) dates by which (i) each expert's reports will be supplied to the adverse side and (ii) each expert's deposition will be completed:
 - o Expert reports, if any, shall be exchanged by September 11, 2008, and expert depositions, if any, shall be completed by October 10, 2008.
- (d) time when discovery is to be completed:
 - o Fact discovery shall be completed by August 11, 2008, and expert discovery shall be completed by October 10, 2008.
- (e) the date by which plaintiff will supply her pre-trial order matters to defendants:
 - o Plaintiff shall supply her pre-trial order matters to defendants by October 28, 2008.
- (f) the date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with briefs and either (1) proposed findings of facts and conclusions of law for a non-jury trial, or (2) proposed voir dire questions and proposed jury instructions, for a jury trial:
 - o The parties shall submit a pre-trial order in a form conforming with the Court's instructions together with briefs and proposed voir dire questions and proposed jury instructions by November 27, 2008.
- (g) The parties shall appear before the Court for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d) on (date to be provided by the Court):

Friday, October 17, 2008, at 4.30 p.m.
(Intentionally left blank.)


- (4) a statement of any limitations to be placed on discovery, including any protective or confidentiality orders:
 - o Defendants shall submit a proposed protective and confidentiality order to plaintiff for plaintiff's approval and agreement by January 25, 2008. The parties shall thereafter jointly submit such protective and confidentiality order to the Court by February 1, 2008.
- (5) a statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement;
- (6) anticipated fields of expert testimony, if any;
 - o To be determined.
- (7) anticipated length of trial and whether to court or jury;

- o The case will be tried to a jury. The parties anticipate a trial of approximately seven days, excluding jury selection.
- (8) This Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of its signing or when justice so requires.
- (9) names, addresses, phone numbers and signatures of counsel:



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Attorneys for Defendants

SO ORDERED.



SHIRA A. SCHEINDLIN
U.S.D.J. 4/28/08